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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CARL LOWE and JACOB DUFFEE, on behalf of themselves and others similarly situated,	)	
	)	Case No. 1:12-cv-02009
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
DIVERSIFIED CONSULTANTS, INC., a Florida corporation,	)	Hon. Judge Joan H. Lefkow
	)	Hon. Mag. Judge Young B. Kim
	)	
Defendant.	)	

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MALINDA DE JESUS, on behalf of plaintiff and the class defined below,	)	
	)	Case No. 1:12-cv-02443
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
DIVERSIFIED CONSULTANTS, INC.,	)	Hon. Judge Joan H. Lefkow
	)	Hon. Mag. Judge Young B. Kim
Defendant.	)	

**PROPOSED SCHEDULING ORDER**

The parties, having held a scheduling conference on April 25, 2012, attended by Alexander H. Burke and Daniel J. Marovitch for Plaintiffs and John E. Brigandi for Defendant, as required by Fed. R. Civ. P. 26(f), submit the following proposed scheduling order:

- (A) The parties believe that an early settlement conference will not likely result in the disposition of the case.
- (B) The parties shall have until August 7, 2012, to make Rule 26(a)(1) disclosures.
- (C) Amendments to the pleadings and/or joinder of additional parties are anticipated and may be sought upon appropriate motion by March 25, 2013. Amendments thereafter may be made only on motion for good cause shown.

- (D) Non-expert discovery will close on April 24, 2013.
- (E) The cut-off date for designation of the trial expert(s) of the party with the burden of proof, as provided in Fed. R. Civ. P. 26(a)(2), is May 24, 2013; for the opposing party's trial expert(s), June 24, 2013. Depositions of the experts shall be taken within 60 days of designation. Unless otherwise stipulated, disclosure of experts will include a report fully in compliance with Rule 26(a)(2)(B).
- (F) Any motion challenging the qualifications of a designated expert must be made within 21 calendar days after the deposition of the expert or the close of discovery, whichever is earlier. If no motion is filed, the court may deem such challenges waived.

### **Dispositive Motions**

Before a dispositive motion is filed, the parties will exchange demand and offer letters in an effort to reach resolution of the case. A status hearing will be set on a date determined by the court, approximately two weeks before the close of discovery. At this time, the parties will report on any outstanding discovery issues, as well on the possibility of settlement and whether a settlement conference with a judge may be helpful. The parties should expect to be referred to a magistrate judge for settlement discussions before filing a motion for summary judgment.

Also at this status hearing, the court will set a schedule for disposition of the case, including trial dates.

### **Consent to Proceed Before a Magistrate Judge**

The parties do not unanimously consent to have their case proceed before a magistrate judge.

ENTER:

Date: JUL 24 2012

  
JOAN HUMPHREY LEFKOW  
U.S. District Judge